

DISTRICT ATTORNEY KINGS COUNTY

350 JAY STREET BROOKLYN, NY 11201-2908 (718) 250-2000 WWW.BROOKLYNDA.ORG

> [INSERT NAME] Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]

Kings County Dkt./Ind. No. [#######]

In connection with the above-named case, the People voluntarily provide the following information regarding:

MOS NAME: THOMAS NAPOLITANO

MOS TAX:

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move <u>in limine</u> to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

Disclosure # 1:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION(S), DATED 11/22/2013, AGAINST MOS NAPOLITANO:

1. MEMOBOOK INCOMPLETE/IMPROPER

ACTION TAKEN: SCHEDULE B COMMAND DISCIPLINE

Disclosure # 2:

THE PEOPLE ARE AWARE OF THE FOLLOWING FEDERAL CIVIL RIGHTS ACTION(S) AND/OR STATE TORT CIVIL LAWSUIT(S) IN WHICH THE INDICATED OFFICER HAS BEEN NAMED AS AN INDIVIDUAL DEFENDANT:

- NIGEL ROOPCHAN V. CITY OF NEW YORK, ET AL, 11-CV-3120, FILED IN THE US EASTERN DISTRCT COURT OF NEW YORK
- 2. RAHIYM HOLMES V. CITY OF NEW YORK, ET AL, 28327-2011, FILED IN KINGS COUNTY SUPREME COURT
- 3. THOMAS JORDAN V. CITY OF NEW YORK, ET AL, 7807/13 FILED IN KINGS COUNTY SUPREME COURT
- DESMON GOINS V. CITY OF NEW YORK, ET AL, 15-CV-07105, FILED IN THE EASTERN DISTRICT COURT OF NEW YORK

Disclosure # 3: (PENDING)

THE FOLLOWING NYPD CHARGES AND SPECIFICATIONS, DATED 02/06/2020, ARE PENDING AGAINST MOS NAPOLITANO:

1.	MOS NAPOLITANO, ON OR ABOUT AUGUST 28, 2018, AT APPROXIMATELY 0722,
2.	MOS NAPOLITANO, ON OR ABOUT AUGUST 28, 2018, AT APPROXIMATELY 0722,
3.	MOS NAPOLITANO, ON OR ABOUT AUGUST 28, 2018, AT APPROXIMATELY 0722,

4. MOS NAPOLITANO, ON OR ABOUT AUGUST 28, 2018, AT APPROXIMATELY 0722,

BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH OCTOBER 13, 2020, THE PEOPLE ARE AWARE OF THE FOLLOWING CCRB SUBSTANTIATED AND/OR PENDING ALLEGATIONS AGAINST THIS OFFICER:

Disclosure # 5:

CCRB CASE: 200913353 REPORT DATE: 08/27/2009

Disclosure # 6:

CCRB CASE: 201010420 REPORT DATE: 07/30/2010 INCIDENT DATE: 07/11/2010

CCRB SUBSTANTIATED ALLEGATION(S):

1. FORCE - PHYSICAL FORCE

NYPD DISPOSITION: ADMINISTRATIVE PROSECUTION UNIT - NOT GUILTY

Disclosure # 7:

CCRB CASE: 201304136 REPORT DATE: 05/15/2013

Disclosure #8:

CCRB CASE: 201310387 REPORT DATE: 11/04/2013

Disclosure # 9:

CCRB CASE: 201609591 REPORT DATE: 11/18/2016 INCIDENT DATE: 10/24/2016

CCRB SUBSTANTIATED ALLEGATION(S):

1. ABUSE - PREMISES ENTERED AND/OR SEARCHED

NYPD DISPOSITION: FORMALIZED TRAINING

Disclosure # 10:

CCRB CASE: 201701615 REPORT DATE: 03/02/2017 INCIDENT DATE: 02/27/2017

CCRB SUBSTANTIATED ALLEGATION(S):

1. FORCE - GUN POINTED

2. ABUSE - PREMISES ENTERED AND/OR SEARCHED

NYPD DISPOSITION: NO DISCIPLINARY ACTION-DUP, NO PENALTY

Disclosure # 11:

CCRB CASE: 201807213 REPORT DATE: 08/30/2018 INCIDENT DATE: 08/28/2018

CCRB SUBSTANTIATED ALLEGATION(S):

- 1. ABUSE ENTRY OF PREMISES
- 2. ABUSE PROPERTY DAMAGED
- 3. ABUSE SEARCH OF PREMISES
- 4. ABUSE THREAT OF ARREST

Eric Gonzalez District Attorney Kings County